

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re: Sealed Seizure Warrant**

**No. 4:23-mj-00418**

**UNOPPOSED MOTION TO  
UNSEAL**

Edward Constantinescu hereby respectfully moves, through his counsel, to unseal the Sealed Application and Affidavit for Seizure Warrant Sworn Telephonically, entered as document 1 in this proceeding (the “Sealed Document”). Counsel for Mr. Constantinescu understands that the Sealed Document includes an affidavit filed in support of three documents titled Warrant to Seize Property Subject to Forfeiture (the “Warrants”). The Warrants relate to the attempted seizure of Mr. Constantinescu’s property in connection with the proceeding United States v. Constantinescu, 4:22-cr-612, in the United States District Court for the Southern District of Texas (the “Related Proceeding”). The Court in the Related Proceeding has stayed the execution of the Warrants. The government has indicated it does not oppose unsealing such document.

Dated: March 31, 2023

Respectfully submitted,

/s/ Matthew A. Ford

Matthew A. Ford

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*Attorney for*

*Edward Constantinescu*

**CERTIFICATE OF SERVICE AND CONFERENCE**

I hereby certify that a true and correct copy of the foregoing was served this 31st day of March 2023 via CM-ECF on all counsel of record. I further certify that, on March 31, 2023, I conferred with Thomas Carter III, Assistant United States Attorney.

/s/ Matthew A. Ford.

Matthew A. Ford